

**Subject:** Re: National Rule 2004 Motion  
**Date:** Tuesday, January 23, 2018 7:32:34 AM Atlantic Standard Time  
**From:** Alexandra Casellas-Cabrera  
**To:** Giselle Lopez  
**CC:** Lourdes Arroyo-Portela, Maria del Carmen Miranda, Eric Perez-Ochoa

Dear counsel,

Good morning. After discussing your e-mail with our co-counsel, National has decided that it cannot agree to the requested extension. While National is open to meeting and conferring with GDB's counsel, the requested extension will not work, as it will leave us no time to file a reply. Per the case management order, parties must file replies eight (8) days before the hearing and as you know the hearings is scheduled for Feb. 7. Nonetheless, National is open to meeting and conferring until the hearing (and would be happy to come to a mutually-acceptable resolution).

Please don't hesitate to contact us should you have any additional questions,

Kind regards,  
Alexandra

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From: Giselle Lopez <[gls@lopezsolerlaw.com](mailto:gls@lopezsolerlaw.com)>  
Sent: Monday, January 22, 2018 9:56 PM  
To: Alexandra Casellas-Cabrera  
Cc: Lourdes Arroyo-Portela; Maria del Carmen Miranda; Eric Perez-Ochoa  
Subject: Re: National Rule 2004 Motion

Thanks. I look forward to your response.

Giselle López Soler, Esq.

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On 1/22/18 7:06 PM, "Alexandra Casellas-Cabrera" <[acasellas@amgprlaw.com](mailto:acasellas@amgprlaw.com)> wrote:

Giselle,

I acknowledge receipt of your e-mail. We will cascade this our co-counsel and respond shortly.

Kind regards,  
Alexandra

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From: Giselle Lopez Soler <[gls@lopezsolerlaw.com](mailto:gls@lopezsolerlaw.com)>  
Sent: Monday, January 22, 2018 5:56 PM  
To: Alexandra Casellas-Cabrera; Eric Perez-Ochoa  
Cc: Giselle Lopez Soler  
Subject: National Rule 2004 Motion

Dear Counsel:

I am representing GDB in connection with National Public Finance Guarantee Corporation's request for certain discovery from GDB, as set forth in the Motion under Rule 2004 filed in P.R. Highway and Transportation Authority's Title III case, No. 17-BK-3567 (Docket # 2247 in Case 17-3283). Further to our telephone conference of earlier today, I am still reviewing the matter, but believe there are certain items as to which we may come to an agreement for production. To allow sufficient time for that process we request your consent to an additional term of seven days, until January 30, 2017, to conclude the meet and confer process or, in the alternative, to respond to National's Rule 2004 motion (Docket # 2247).

Kind Regards,

Giselle Lopez Soler